

## **REMARKS**

Claims 1, 8, 9, 19, 21, 22 and 27-29 are now pending in the application. Claims 1, 8, 9, 19, 21, 22 and 27-29 stand rejected. Claims 2-7, 10-18, 20 and 23-26 have been cancelled. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 112**

Claim 22 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point and distinctly claim the subject matter which Applicant regards as the invention. This rejection is respectfully traversed.

The comments that there is no antecedent basis for the term “the occupant” in Claim 22. Claim 22 has been amended, as set forth above, to replace the term “the occupant” with the term “the traveling customer”, for which Applicants respectfully submit there is proper antecedent basis.

For at least the reasons set forth above, Applicants respectfully request that the §112 rejection of Claim 22 be withdrawn.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1, 8, 9, 19, 21, 22 and 27-29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gopen (U.S. Pat. No. 6,542,814) in view of Lauter (U.S. Pat. No. 5,838,261). These rejections are respectfully traversed.

1. Regarding Claim 1, as amended, Claim 1 recites, “A method for providing information to traveling customers of a mobile platform, said method comprising: presenting a moving map displaying graphical real time representations of a geographical region along a travel path of the mobile platform and including a plurality of information icons that indicate points of interest along a travel path of the mobile platform to at least one traveling customer of the mobile platform, via at least one passenger display; associating each information icon with at least one of a plurality of information modules, each information module containing information about a different one of the points of interest; incorporating the information modules into a plurality of information manuals; marking each information manual with a plurality of identifiers to

appropriately link each information module within the information manual with the associated information icon; and presenting to the traveling customer the information module associated with an information icon selected by the traveling customer.”

Applicants strenuously submit that neither Gopen nor Lauterbach et al. describe, show or suggest a method for providing information to traveling customers of a mobile platform including the limitations set forth in amended Claim 1. For example, neither Gopen nor Lauterbach et al. describe, show or suggest presenting a moving map that includes a plurality of information icons that indicate points of interest along a travel path of the mobile platform to at least one traveling customer of the mobile platform; associating each information icon with at least one of a plurality of information modules, each information module containing information about a different one of the points of interest; incorporating the information modules into a plurality of information manuals; marking each information manual with a plurality of identifiers to appropriately link each information module within the information manual with the associated information icon; and presenting to the traveling customer the information module associated with an information icon selected by the traveling customer.

Rather, Gopen describes an aircraft-borne system 100, on which software for displaying interactive flight path information is executed. A server 102 is connected to a number of clients 104. Each client 104 is preferably connected to a screen 106 such as a flat-panel LCD screen. The clients 104 are preferably located at individual passenger seats. The server 102 is preferably connected to a content storage unit 108, which is preferably located on board the aircraft as well. The content storage unit 108 may be a hard drive or other data storage structure associated with the server 102. Data within the content storage unit 108 may be arranged as a database. After a map 300 is served to a client 104 and displayed on a screen 106, a passenger viewing the display may select an identifier 302 on the map 300. The selection of an identifier 302 is transmitted from the client 104 connected to the screen 106 to the server 102. The server 102 retrieves data corresponding to the selected identifier 302, from the content storage unit 108. The server 102 serves to the client 104 the data that was retrieved from the content storage unit 108.

Furthermore, Gopen describes that preferably, the map 300 may be scrolled before an identifier 302 is selected. That is, the passenger can move the map in a particular direction to see an area not originally on the map 300, and one or more identifiers 302 in that area of the map 300 not originally shown. The scrolling function may be implemented in several ways. In one embodiment, when the passenger scrolls the map, such as by clicking on a icon representing a compass direction or by dragging a scroll bar on the edge of the map 300, that scrolling input is transmitted to the server 102, which then obtains a new map 300 from the content storage unit 108, where that new map 300 reflects the area to which the user has scrolled. The server 102 then serves that new map 300 back to the client 104. In another embodiment, the server 102 initially serves to the client 104 a map 300 that is larger than the screen 106. In this way, the passenger can scroll the map 300 to some extent without the need for additional map data to be served to the client 104.

Lauta et al. describes a monitoring device 1 for *monitoring a complex system 2* that includes a plurality of units E1, E2, . . . , En, for example computers, between which there is a very large number of interconnections. The complex system may be a railroad network, a nuclear power station or an aircraft, for example a helicopter. The monitoring device 1 includes a central unit 3 connected to at least some of said units E1 through En, and to display means 4, for example *a computer screen, connected by a link 5 to said central unit 3*. Said central unit 3 monitors the units E1 through En to which it is connected and can transmit *monitoring information* to the display means 4, automatically in some cases or at the request of an operator, e.g. a pilot, of a transport aircraft. When it receives monitoring information, said display means 4 displays a message concerning said monitoring information to the operator, e.g. pilot. The monitoring information, *in particular fault information, indicates the status of the complex system 2 or of certain units E1 through En* of said complex system 2. When fault information is transmitted, the display means 4 displays an alarm message that is generally accompanied by proposals or recommendations, *indicating to the operator the conduct required* in such a situation, *in particular, for a pilot, what he must do*. When monitoring information is sent in flight, the pilot or the copilot must access any necessary additional information associated with that monitoring information by

consulting corresponding technical documentation. The central unit 3 is loaded with a database containing additional information associated with said monitoring information. If said database includes additional information associated with said monitoring information to be transmitted, when it transmits said monitoring information the central unit 3 indicates the existence of this additional information on the display means 4 via a characteristic signal, for example a message in words or a particular pictogram. In this way, if a message concerning *monitoring information* is accompanied by said predefined characteristic signal, *the pilot* is made aware of the need to consult the corresponding technical documentation providing additional information *indicating the conduct required* in such a situation.

Thus, neither Gopen nor Lauterbach et al. describe, show or suggest a method for providing information to traveling customers of a mobile platform that includes presenting a *moving map* that includes a plurality of information icons that indicate points of interest along a travel path of the mobile platform to at least one traveling customer of the mobile platform. Nor does Gopen nor Lauterbach et al. describe, show or suggest associating each information icon with at least one of a plurality of information modules *incorporated in to a plurality of information manuals*, wherein each information module contains information about a different one of the points of interest. Nor does Gopen nor Lauterbach et al. describe, show or suggest *marking each information manual* with a plurality of identifiers to appropriately link each information module within the information manual with the associated information icon and presenting to the traveling customer the information module associated with an information icon selected by the traveling customer.

Additionally, Applicants strenuously traverse the Office's official notice that constantly updating a map display used for navigation purposes renders obvious the 'moving map' recited in amended Claim 1. As the Office points out, Gopen describes *still images* of map data. Constantly updating still images provides periodic replacement of the data shown on the screen, much in the fashion of a 'slide show'. Updating still images inherently leaves periods between the update in which the data shown is not current, i.e. not real time. Amended Claim 1, recites a *moving map* that

displays graphical *real time* representations of a geographical region along a travel path of the mobile platform. As the Office states, Gopen does not describe a moving map and Applicants respectfully submit that updating of still images would not render obvious the moving map displaying graphical real time representations of a geographical region recited in amended Claim 1.

Furthermore, Gopen teaches away from a moving map. Gopen describes a preferred embodiment wherein the map 300 may be scrolled before an identifier 302 is selected. That is, the passenger can move the map in a particular direction to see an area not originally on the map 300, and one or more identifiers 302 in that area of the map 300 not originally shown. The scrolling function may be implemented in several ways... which then obtains a new map 300 from the content storage unit 108, where that new map 300 reflects the area to which the user has scrolled. Applicants respectfully submit that a scrolling feature would only be applicable to a still image.

Applicants, therefore strenuously submit that, in addition to Gopen's failure to describe the limitations recited in amended Claim 1, and the Applicants position that updating still images would not render obvious the moving map displaying graphical real time representations of a geographical region, as recited in amended Claim 1, there is no motivation for the Office's official notice. One of ordinary skill in the art would not be motivated to conclude that a real time moving map would be rendered obvious by a still map that can be scrolled. It is abundantly apparent that to scroll an image the image must be a still image and not a moving image that constantly changes, i.e. moves, to display a real time representation of a geographical location being traversed by a mobile platform, as recited in amended Claim 1.

Furthermore, Applicants strenuously submit that neither Gopen nor Lauterbach et al. suggest any motivation to combine the non-analogous technologies and teachings of the independent references. Gopen is directed toward an in-flight entertainment system, while Lauterbach et al. is non-analogously directed toward monitoring a complex system. It is well established that there must be some basis for concluding that a reference would have been considered by one skilled in the art working on a problem to

which the invention pertains for the teachings of a reference to be prior art under 35 U.S.C. 103. For no matter what the reference teaches, it could not have rendered the invention obvious, at the time the invention was made, to a person having ordinary skill in the art to which the subject matter pertains, unless the hypothetical person would have considered the reference. In re Horn, 203 USPQ 969 (CCPA 1979). Applicants respectfully submit that one skilled in the art would not have considered combining a reference directed toward in-flight entertainment system with a reference directed toward monitoring a complex system to construct the present invention as recited in amended Claim 1.

Applicants respectfully submit that there is no suggestion in Gopen or Lauter et al. to combine the features described in each respective piece of cited art to obtain the present invention as recited in amended Claim 1. It is well recognized that absent some teaching, suggestion or incentive supporting the combination of the cited references, obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to have selected an alternative design choice. Applicants submit that it would not have been an obvious matter of design choice to simply take the isolated teaching of Gopen and Lauter et al, where there is no suggestion or motivation to combine the teachings of these references, to construct the present invention as recited in amended Claim 1.

Further yet, It is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. It is furthermore impermissible to engage in hindsight reconstruction of the claimed invention, using the Applicant's structure as a template and selecting elements from references to fill the gaps. The references themselves must provide some teaching whereby Applicant's combination would have been obvious. Interconnect Planning, 227 USPQ 551. In this instance it appears that the Applicants' own disclosure has been used as a "roadmap" to piecemeal together the teachings of various references where the references do not suggest the desirability or motivation of combining the references. Obviousness cannot be established by merely suggesting

that it would be obvious to one of ordinary skill in the art to have selected an alternative design choice.

For at least the reasons set forth above, Applicants respectfully submit that amended Claim 1 is patentable over Gopen in view of Lauter et al.

Claims 8 and 27 depend from amended Claim 1. When the recitations of Claims 8 and 27 are considered in combination with the recitations of amended Claim 1, Applicants submit that Claims 8 and 27 are likewise patentable over Gopen in view of Lauter et al.

2. Regarding Claim 9, Claim 9 includes limitations similar to those recited in amended Claim 1. In accordance with the remarks set forth above with respect to amended Claim 1, Applicants respectfully submit that Claim 9 is likewise patentable over Gopen in view of Lauter et al.

Claim 28 depends from Claim 9. When the recitations of Claim 28 are considered in combination with the recitations of Claim 19, Applicants submit that Claim 28 is likewise patentable over Gopen in view of Lauter et al.

3. Regarding Claim 19, Claim 19 includes limitations similar to those recited in amended Claim 1. In accordance with the remarks set forth above with respect to amended Claim 1, Applicants respectfully submit that Claim 19 is likewise patentable over Gopen in view of Lauter et al.

Claims 21 and 29 depend from Claim 19. When the recitations of Claims 21 and 29 are considered in combination with the recitations of Claim 19, Applicants submit that Claims 21 and 29 are likewise patentable over Gopen in view of Lauter et al.

4. Regarding Claim 22, Claim 22 has been amended, as set forth above, to include limitations similar to those recited in amended Claim 1. In accordance with the remarks set forth above with respect to amended Claim 1, Applicants respectfully submit that amended Claim 22 is likewise patentable over Gopen in view of Lauter et al.

For at least the reasons set forth above, Applicants respectfully request that the §103 rejections of Claims 1, 8, 9, 19, 21, 22 and 27-29 be withdrawn.

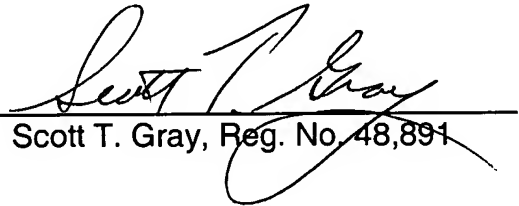
**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (314) 726-7525.

Respectfully submitted,

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